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CERTIFIED MAIL RETURN RECEIPT REQUESTED

APR 08 1993

Ms. Michelle Glenn
Waste Management Division
United States Environmental Protection Agency, Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Re: MCB Camp Lejeune; Responses to EPA Region IV Comments on
the Draft SI for Site 44, Jones Street Dump

Dear Ms. Glenn:

We have received your comments (letter dated and received
December 1, 1992) to the subject document. The Navy/Marine Corps
responses to these comments are enclosed.

Please direct any questions concerning these responses to Mr.
Byron Brant at (804) 445-2931.

Sincerely,

L. A. BOUCHER, P.E.
Head
Installation Restoration Section
South
Environmental Programs Branch
Environmental Quality Division
By direction of the Commander

Enclosure

Copy to:
NCDEHNR (Mr. Peter Burger)
MCB Camp Lejeune (Mr. Neal Paul)

Blind copy to:
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**Response to Comments Submitted by the
US Environmental Protection Agency, Region IV
on the Draft Site Inspection Report for
Site 44, Jones Street Dump
MCB Camp Lejeune, North Carolina
Received Via Letter Dated 1 Dec 92**

Responses to General Comments

1. The comments on the Draft Site Inspections (SI) Report will be considered during the preparation of RI/FS Project Plans for Site 44.
2. The human health and ecological risk assessment will be conducted based on the current land use and the future potential land-use scenarios (residential exposure scenarios).
3. The shallow or "surficial aquifer" consists of a series of sediments, primarily sand and clay, that commonly extend to depths of 50 to 100 feet. ("Assessment of Hydrologic and Hydrogeologic Data at Camp Lejeune Marine Corps Base, North Carolina", USGS, 1989) The Castle Hayne aquifer is also a series of sediments lying beneath the surficial aquifer. Throughout most of Camp Lejeune (where studies have been conducted by the DoN), no impermeable confining layer exists between the two aquifers. Intermittent clay lenses and dense silt lenses separate the two aquifers and separate layers within the Castle Hayne aquifer, but the lenses are not continuous. This will be clarified in the report and in the RI/FS Work Plans. Cross-sections will be included in the RI/FS Work Plan to better depict site specific conditions.
4. The SI report has been revised to present only the data collected during the field investigation. The preliminary risk assessment has been deleted. A human health and ecological risk assessment will be conducted as part of the RI/FS. The baseline risk assessment will be conducted based on current land use (i.e., military base) and future potential land use (i.e., residential).
5. Unlike other Site Inspections where the site is scored under the HRS system to determine whether it should be included on the NPL, a different approach was taken to evaluate the various sites since MCB Camp Lejeune is already on the NPL. A preliminary risk assessment was conducted so that an objective decision could be made by the DoN/EPA/DEHNR with respect to whether the site should undergo an RI/FS, or whether the site should be excluded from further studies. As part of the preliminary risk assessment, preliminary remediation goals (PRGs) were established and compared to existing site characteristics. Based on a meeting conducted on March 1 between the DoN, EPA, and DEHNR, the SI will not include the performance of a risk assessment. Risk assessments will be conducted as part of the RI/FS. An RI/FS will be conducted only if

contamination is detected on SI sites above background levels or ARARs.

6. The Navy/Marine Corps will give consideration to fencing and posting signs around the Jones Street Dump area.

Specific Comments

1. No response required.
2. The acronym "NEESA" indicates Naval Energy and Environmental Support Activity. This document is the Sampling and Chemical Analysis Quality Assurance Requirements for the Navy Installation Restoration Program. The purpose of the document is to specify the requirements for the control of the accuracy, precision, and completeness of samples, and data from the point of collection through reporting. Sampling performed under the Department of the Navy's Installation Restoration Program at MCB Camp Lejeune will be conducted in accordance with ECB SOPQAM.
3. Risk assessments will not be conducted as part of the SI. A quantitative risk assessment will be performed at this site during the upcoming RI.
4. According to the North Carolina Administrative Code, Title 15, Subchapter 2L, "Classifications and Water Quality Standards Applicable to the Groundwaters of North Carolina", the Castle Hayne aquifer should be classified as GA. This classification of groundwater is for existing or potential sources of drinking water supplies for humans. This groundwater classification is for waters which are considered suitable for drinking in their natural state. The classification of the Castle Hayne aquifer has been included in the Site Inspection Report, Section 2.1.4. The surficial aquifer is classified as GC. A GC classification indicates that the aquifer is a source of water other than for drinking.
5. Site 44 will be added to the list of RI/FS sites at MCB Camp Lejeune.
6. The Jones Street Dump Site is located less than one-quarter of a mile north of the MCAS housing area. The Site Inspection Report has been changed to reflect this.
7. Six soil test borings were drilled on-site. Page 1-6 contained a typographical error which has been corrected.
8. Sections 2.2.1 and 2.2.4 have been modified to eliminate any confusion with the groundwater elevations.
9. Future decontamination of downhole drilling equipment will include all of the

decontamination steps described in the ECB SOPQAM.

10. Please see the response to Specific Comment 4.
11. There are currently 73 wells actively drawing drinking water. There are 100 wells on MCB Camp Lejeune for the purpose of obtaining drinking water. Some wells have been removed from service due to cave-in, contamination, broken pumps or various other reasons. There are also new wells scheduled for installation. Therefore, due to changes in daily well operating conditions, the number of wells in service changes. Section 2.1.8 has been revised to better describe the active water supply well situation.
12. The Castle Hayne aquifer is, at best, a semi-confined aquifer throughout the region. The Site Inspection Report has been changed to reflect this. A description of the surficial aquifer and the Castle Hayne aquifer can be found in Section 2.1.4.
13. Please see the response to Specific Comment 8.
14. Please see the response to Specific Comment 8.
15. The Initial Assessment Study (Water and Air Research, 1983) reported that only "minor quantities of potentially hazardous substances" were disposed of at the site. This report also indicated that the predominant types of wastes disposed at Site 44 are construction and general debris.
16. The corresponding values for base-specific and regional background levels for inorganics in soil have been included in the Site Inspection report.
17. The text has been corrected to indicate that the concentrations of beryllium are above the MCL. The concentrations of arsenic are not above the 50 ug/l MCL.
18. The discrepancy over the concentration of benzoic acid has been corrected.
19. The concentrations/quantitation limits for the semi-volatile fraction of sample 44SB0600 were rejected "R" during validation. The Table has been corrected to indicate the numerical values.
20. No upgradient samples were collected. Samples were collected in accordance with the Final Sampling and Analysis Plan, which was approved by the North Carolina DEHNR and EPA. Upgradient samples will be collected during the upcoming RI.
21. Samples collected from groundwater and soil were obtained from the former disposal area. The former disposal area is well defined. It is surrounded by woods and overgrown with vegetation. Based on the sampling locations, the

concentrations detected can be assumed to be representative of the site. Additional soil samples will be collected during the RI to better characterize the soil at this site.

22. This section has been deleted from the SI report since a quantitative risk assessment will be conducted as part of the RI.
23. The correct value for this contaminant will be used in the baseline risk assessment.
24. The baseline risk assessment will include an estimation of risks based on current land use (i.e., military base) and future potential land use (i.e., residential area).
25. This section has been deleted from the SI report since a quantitative risk assessment will be conducted as part of the RI.

The aquifer classification has been added to Section 2 of the Site Inspection Report. The surficial aquifer is classified as GC and the Castle Hayne aquifer is classified as GA.

26. Site-specific background values for soil will be collected during the RI.
27. This comment will be considered when the baseline risk assessment is conducted during the RI.
28. Soil will be analyzed for TOC during the RI. This value will be used in place of a literature value.
29. Please see the response to Specific Comment 24.
30. We will analyze for TOC in soil during the RI.
31. "Aquifer Classification" has been added to Section 2 of the report.
32. A remedial investigation/feasibility study will be conducted at Site 44.
33. Monitoring wells will be installed in the deep portion of the Castle Hayne aquifer during the RI.
34. Form I's for the pesticide/PCB results for samples 44MW0100, 44MW0100D, 44MW106, 44MW200, 44MW0235, 44MW0300, and 44MW0306 will be incorporated into the Final Report. The forms are currently with the data validation firm and are being forwarded to our contractor.

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